

REMARKS

The Applicant has filed the present Response in reply to the outstanding Official Action of October 1, 2002, and the Applicant respectfully submits that the Response is fully responsive to the Official Action for reasons set forth below in detail.

In the Official Action, the Examiner rejected Claims 1-6 pursuant to 35 U.S.C. §103(a), as allegedly unpatentable over Takita, *et al.* (U.S. Patent No. 6,151,005) (hereinafter "Takita"). More specifically, the Examiner alleged that Takita's prior art section that is directed to a liquid-crystal driving circuit (Fig. 37) and voltage divider circuit (Fig. 38), which select a voltage that corresponds to the display data and applies the voltage to the liquid crystal display element (See Takita Col. 2, lines 8-11 and lines 54-61), teaches or suggests a liquid crystal display controller that comprises a selector for choosing and outputting a digital image input signal or the inverted digital image input signal to a data processor, depending on a switching signal. The Examiner further alleged that the selecting element 4104 switched by alternating signal 4103 in Fig. 41 teaches or suggests a liquid crystal display controller that comprises a selector for choosing and outputting the digital image input signal or the inverted digital image input signal to a data processor, depending on a switching signal.

The Applicant respectfully disagrees with the Examiner's allegations and proffers the following arguments in support of the patentability of Claims 1-6 over cited and applied prior art reference to Takita.

As annunciated by the Federal Circuit in *In re Fritch*, 972 F.2d 1260, 1266 (Fed. Cir. 1992), "[t]he mere fact that the prior art may be modified in the manner

suggested by the Examiner does not make the modification obvious unless the prior art suggested the desirability of the modification" (emphasis added). Furthermore, the annunciated principle requires that the prior art suggest modifying the teachings of the references so as to produce the claimed invention. *Id.* At the time the invention is made, there must be reason apparent to a skilled artisan for applying the teachings of the reference or else the use of such teachings will be improper hindsight. *In re Noyima*, 184 USPQ 607 (C.C.P.A. 1975). Additionally, the Examiner cannot establish obviousness by locating references which describe various aspects of an invention without also providing evidence of the motivating force which would impel the skilled artisan to do what the applicant has done. *Ex Parte Levengood*, 28 USPQ 2d 1330, 1302 (Bd. Pt. App. & Int'f. 1993).

- In traversing the rejections of independent Claims 1 and 6 pursuant to 35 U.S.C. §103(a), the Applicant respectfully submits that the cited and applied prior art reference to Takita does not teach or suggest a liquid crystal display controller for inverting a digital image input signal, and choosing and outputting the digital image input signal or the inverted digital image input signal depending on a switching signal, as particularly claimed in Claims 1 and 6. That is, the claimed invention is directed to inverting a data signal (i.e., digital image input signal) and selecting either the inverted or non-inverted data signal in a liquid crystal display controller based on a switching signal (See above-identified application's Fig. 1). To the contrary of the claimed invention, Takita is directed to inverting and selecting gradation voltage to drive liquid crystal inversion. More specifically, in Figs. 37 and 38, Takita teaches a voltage divider circuit

3714, which divides voltages of 2 levels into 16 levels and selects a voltage based on the corresponding lower 4 bits of the latched display data (See Takita Col. 1, lines 44-46; Col. 1 line 64 – Col. 2, line 2; Col. 2 lines 44-49). It is clear that contrary to the claimed liquid crystal display controller, which selects the inverted or non-inverted data signal, Takita's voltage divider circuit selects a voltage level. Additionally, in Fig. 41, Takita teaches a liquid crystal power source circuit for selecting a set of 9 voltage levels from 2 sets of voltage levels (V_{cc} or V_{ss}) based on the alternating signal in order to drive the liquid crystal panel (See Takita Col. 42, lines 22-51). However, the Applicant once again respectfully submits that the selection of voltage levels in a power source circuit does not teach or suggest inverting a digital image input signal (data signal) and selecting the inverted or non-inverted data signal in a liquid crystal display controller, as particularly claimed in Claims 1 and 6. The Applicant respectfully submits that Takita provides no motivation to one skilled in the art to modify its voltage divider circuit and power source circuit that select voltages into a liquid crystal display controller that inverts a digital image input signal (data signal) and selects the digital image input signal or the inverted digital image input signal depending on a switching signal.

In view of the foregoing, the Applicant respectfully requests the Examiner to withdraw the rejection of independent Claims 1 and 6 pursuant to 35 U.S.C. §103(a). Furthermore, Applicant respectfully requests the Examiner to withdraw the rejections of dependent Claims 2-5 pursuant to 35 U.S.C. §103(a), based on their dependencies from independent Claim 1.

In view of the foregoing, the Applicant believes that the above-identified application is in condition for allowance and henceforth respectfully solicits the allowance of the application. If the Examiner believes a telephone conference might expedite the allowance of this application, the Applicant respectfully requests that the Examiner call the undersigned, the Applicant's attorney, at the following telephone number: (516) 742-4343.

Respectfully submitted,



Paul J. Esatto, Jr.
Registration No. 30,749

SCULLY, SCOTT, MURPHY & PRESSER
400 Garden City Plaza
Garden City, New York 11530
(516) 742-4343

AGV:eg